

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

**CELLULAR COMMUNICATIONS
EQUIPMENT LLC,**
Plaintiff,

v.

LG ELECTRONICS, INC., et al.,
Defendants.

Civil Action No. 6:14-cv-982

CONSOLIDATED LEAD CASE

JOINT NOTICE OF RESOLUTION AND MOTION TO STAY

Plaintiff Cellular Communications Equipment LLC (“CCE”) and Defendants LG Electronics, Inc. and LG Electronics U.S.A., Inc. (“LGE”) notify the Court that they have reached an agreement in principle that resolves all remaining claims in the above-captioned Consolidated Lead Case.

In furtherance of their agreement, CCE and LGE expect to move to dismiss constituent Civil Action Nos. 6:14-cv-982 and 6:13-cv-508 in the next thirty (30) days. Thus, CCE and LGE respectfully ask that the Court stay all deadlines in this Consolidated Lead Case while CCE and LGE memorialize their resolution and move to dismiss.

LGE’s co-defendants in constituent Civil Action Nos. 6:14-cv-982 and 6:13-cv-508 do not oppose this motion, and CCE and LGE ask that the Court enter the attendant proposed Order Staying Deadlines, accordingly.

Dated: July 13, 2016

Respectfully submitted,

/s/ Edward R. Nelson III
Edward R. Nelson III
ed@nelbum.com

Respectfully submitted,

/s/ Jamie B. Beaber
Jamie B. Beaber (D.C. Bar No. 484186)
Kfir B. Levy (D.C. Bar No. 989212)

<p>Texas State Bar No. 00797142 Ryan P. Griffin ryan@nelbum.com Texas State Bar No. 24053687 Thomas C. Cecil tom@nelbum.com Texas State Bar No. 24069489 NELSON BUMGARDNER PC 3131 West 7th Street, Suite 300 Fort Worth, Texas 76107 Phone: (817) 377-9111 Fax: (817) 377-3485</p> <p>Jeffrey R. Bragalone Texas Bar No. 02855775 Terry A. Saad Texas Bar No. 24066015 Jonathan H. Rastegar Texas Bar No. 24064043 BRAGALONE CONROY PC 2200 Ross Avenue Suite 4500W Dallas, TX 75201 Tel: (214) 785-6670 Fax: (214) 785-6680 jbragalone@bcpc-law.com tsaad@bcpc-law.com jrastegar@bcpc-law.com</p> <p>Bradley W. Caldwell Texas Bar No. 24040630 Email: bcaldwell@caldwelcc.com Jason D. Cassady Texas Bar No. 24045625 Email: jcassady@caldwelcc.com John Austin Curry Texas Bar No. 24059636 Email: acurry@caldwelcc.com CALDWELL CASSADY & CURRY 2101 Cedar Springs Road, Suite 1000 Dallas, TX 75201 Telephone: (214) 888-4848 Facsimile: (214) 888-4849</p> <p>T. John Ward, Jr. Texas State Bar No. 00794818</p>	<p>Saqib J. Siddiqui MAYER BROWN LLP 1999 K Street, N.W. Washington, DC 20006-1101 Telephone: (202) 263-3000 Facsimile: (202) 263-3300 jbeaber@mayerbrown.com klevy@mayerbrown.com ssiddiqui@mayerbrown.com</p> <p>Robert G. Pluta (IL Bar No. 6278255) MAYER BROWN LLP 71 S. Wacker Drive Chicago, IL 60606 Telephone: (312) 782-0600 Facsimile: (312) 701-7711 rpluta@mayerbrown.com</p> <p>Michael E. Jones State Bar No. 10929400 mikejones@potterminton.com Allen F. Gardner State Bar No. 24043679 allengardner@potterminton.com POTTER MINTON P.C. 110 N. College Avenue, Suite 500 Tyler, Texas 75702 Telephone: (903) 597-8311 Facsimile: (903) 593-0846</p> <p>ATTORNEYS FOR LG ELECTRONICS, INC. AND LG ELECTRONICS U.S.A., INC.</p>
--	--

<p>J. Wesley Hill Texas State Bar No. 24032294 Claire Abernathy Henry Texas State Bar No. 24053063 WARD, SMITH, & HILL PLLC P.O. Box 1231 1127 Judson Rd. Ste. 220 Longview, Texas 75606-1231 (903) 757-6400 (903) 757-2323 (fax) jw@jwfirm.com wh@wsfirm.com claire@wsfirm.com</p> <p>ATTORNEYS FOR CELLULAR COMMUNICATIONS EQUIPMENT LLC</p>	
---	--

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(h), I certify that the all parties have met and conferred and that this Joint Motion is unopposed.

/s/ Edward R. Nelson III

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of July, 2016, I electronically filed the foregoing document with the clerk of the Court for the U.S. District Court, Eastern District of Texas, Tyler Division, using the Court's electronic case filing system. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Edward R. Nelson III